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Avrum J. Rosen, Esq.
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Settlement Date: March 16, 2023

Objection Date: March 13, 2023

Attorneys for the Reorganized Debtor

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

FRALEG GROUP, INC.,

Case No.: 22-41410-jmm

Debtor.

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NOTICE OF SETTLEMENT OF PROPOSED ORDER

PLEASE TAKE NOTICE, that the attached proposed revised Order (i) authorizing Fraleg Group, Inc.’s, the post confirmation debtor (the “Reorganized Debtor”), sale of the real property commonly known as consisting of one (1) multi-family residential building located at 112 North Walnut Street, East Orange, New Jersey 07017 (the “Property”) and a vacant unimproved land commonly known as and located at 116 North Walnut Street, East Orange, New Jersey 07017 (the “Vacant Lot” and the Property are collectively the “Properties”), either together or separately, pursuant to the terms as set forth in the Terms and Conditions of Sale and subject to higher and better offers at a public auction, free and clear of all liens, claims, encumbrances and other interests (collectively, the “Liens”) with such Liens to attach to the proceeds of the sale for good and valuable consideration, substantially in accordance with the terms and conditions set forth herein; (ii) approving Terms and Conditions of Sale for submitting offers and approving the form and manner of notice with respect to the Auction as set forth in the Plan; (iii) scheduling a hearing to approve of the sale of the Properties to the successful bidder or bidders (the “Sale Hearing”); and (v) granting such other and further relief as this Court deems just and proper under the

circumstances (the “Proposed Order”), will be submitted for signature to the Honorable Jil Mazer-Marino, United States Bankruptcy Judge for the Eastern District of New York, on **March 16, 2023 at 5:00 p.m.**

PLEASE TAKE FURTHER NOTICE, that attached as **Exhibit “A”** is a redlined copy of the Proposed Order, which was part of the Reorganized Debtor’s plan of reorganization [Dkt. No. 52]¹ and this Court’s Order Confirming the Debtor’s Amended Plan of Reorganization and Final Approval of the Amended Disclosure Statement [Dkt. No. 65]² reflecting the Reorganized Debtor’s proposed changes to the Proposed Order consistent with the issues raised in the objection to CAF Borrower GS LLC’s motion for relief from the automatic stay and in rem relief.

PLEASE TAKE FURTHER NOTICE, that objections, if any, to the Proposed Order must be filed on the Court’s electronic docket system and made in writing and received by (i) Law Offices of Avrum J. Rosen, PLLC, 38 New Street, Huntington, New York 11743, Attn: Avrum J. Rosen, Esq.; (ii) the Office of the United States Trustee, One Bowling Green, Suite 510, New York, New York 10004; and (iii) the Honorable Jil-Mazer-Marino at Chambers **by no later than 4:00 p.m. (prevailing Eastern time) on March 13, 2023**. Unless objections are received at that time, the Proposed Order may be signed.

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¹ Including all amendments and supplements filed thereafter.

² The Plan became effective as of December 16, 2022 [Dkt. No. 69].

PLEASE TAKE FURTHER NOTICE, that if written objections are timely filed then a hearing may be held before the Court at a time scheduled by the Court.

Dated: Huntington, New York
March 6, 2023

Respectfully submitted,

Law Offices of Avrum J. Rosen, PLLC
Attorneys for David J. Doyaga, Sr., Trustee

By: /s/ Avrum J. Rosen
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